

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 1:19-CR-10080-NMG
	)	
GREGORY COLBURN et al.,	)	
Defendants	)	

**UNOPPOSED MOTION TO MODIFY PROTECTIVE ORDER GOVERNING  
DOCUMENTS RECEIVED FROM USC**

Gamal Abdelaziz, Homayoun Zadeh, and Elisabeth Kimmel respectfully request that the Court modify the current protective order governing documents produced by USC to Defendants Abdelaziz, Zadeh, and Kimmel<sup>1</sup> to permit Defendants to show documents to potential witnesses under certain agreed-upon conditions specified in the attached Proposed Order, Exhibit A. USC does not object to this motion.

Dated: May 19, 2021

Respectfully submitted,

GAMAL ABDELAZIZ

By his attorney,

/s/ Robert Sheketoff  
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<sup>1</sup> As to Abdelaziz, see Dkt. 1081. As to Zadeh, see Dkt. 1696. As to Kimmel, see Dkt. 830.

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#### **RULE 7.1 CERTIFICATE**

Counsel for Defendant Abdelaziz conferred with counsel for USC prior to filing this motion. USC does not oppose the relief requested.

/s/ Robert Sheketoff

#### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the forgoing was filed electronically on May 19, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Robert Sheketoff

## **EXHIBIT A**

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	No. 1:19-CR-10080-NMG
	)	
GREGORY COLBURN et al.,	)	
Defendants	)	

**[PROPOSED] ORDER**

The USC protective orders entered by the Court at Dkts. 830, 1081, and 1696 are hereby modified as follows:

Notwithstanding the terms of Defendants Abdelaziz's, Zadeh's, and Kimmel's Protective Orders with USC (Dkts. 830, 1081, and 1696), Defendants may show Protected USC Material to potential witnesses and their counsel according to the following conditions:

If a potential witness is represented by counsel, defendants Abdelaziz, Zadeh, and Kimmel can show the documents via Zoom (or similar program) or can show a hard copy version of the Protected USC Material, provided that both the attorney and potential witness sign a version of a Rider Agreement to the Protective Order. The signed Rider Agreement must be provided to USC within 24 hours of showing any Protected USC Material to any potential witnesses and his/her counsel.

If a potential witness is not represented by counsel, defendants Abdelaziz, Zadeh, and Kimmel can show a hard copy version of the Protected USC Material to the potential witness in person, provided that the potential witness signs a version of a Rider Agreement to the Protective Order. The signed Rider Agreement must be provided to USC within 24 hours of showing of any Protected USC Material to any potential witness.

USC will maintain in strict confidence the names of the potential witnesses who have signed the Rider Agreement and will not disclose such names to anyone outside of USC and/or its counsel, except as part of a filing with the Court, if necessary, which USC will request to file under seal. USC will use the identity of the individuals who sign the Rider Agreement for the sole purpose of enforcing the protective order, if it becomes necessary.

Defendants Abdelaziz, Zadeh, and Kimmel will each maintain an internal list identifying •to do so, and not for any other purpose. which Protected USC Material was shared with each potential witness. Upon a showing of a reasonable basis that Protected USC Material was improperly disclosed to the public or any party outside of the agreed-upon protective order, Defendants Abdelaziz, Zadeh, and Kimmel will provide to USC their lists identifying which Protected USC Material was shared to the corresponding witnesses, so that USC can enforce the protective order.

The Rider Agreement shall read as follows:

**RIDER A**  
**AGREEMENT WITH RESPECT TO CONFIDENTIAL MATERIAL**

I, \_\_\_\_\_, state that:

1. My address is \_\_\_\_\_.
2. I have received a copy of the Protective Order between the University of Southern California (“USC”) and Defendant [INSERT] (“the Defendant”) dated [INSERT] (the “Protective Order”) concerning the production of material confidentially produced by USC to the Defendant (“Protected USC Material”).
3. I have carefully read and understand the provisions of the Protective Order.
4. I will strictly maintain, protect and safeguard the confidentiality of all Protected USC Material. I will not communicate, summarize, or otherwise disclose the contents of Protected USC Material to anyone.
5. I will not take any photographs, screenshots, or otherwise copy any Protected USC Material.
6. I understand that any violation of the Protective Order or this Agreement may result in severe consequences, including but not limited to monetary penalty. I hereby submit to the jurisdiction of the United States District Court, District of Massachusetts for the purpose of enforcement of the Agreement.

DATED: \_\_\_\_\_